ARCADIS Design & Consultancy for natural and built assets

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Subject:
Pre-Design Investigation Summary
Lower Ley Creek Subsite of the Onondaga Lake Superfund Site
Syracuse, New York

ENVIRONMENT

Date:
October 19, 2018

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Dear Ms. Tames:

On behalf of the Respondents to the Administrative Order on Consent for Remedial Design (Respondents), Arcadis of New York, Inc. (Arcadis) thanks you for your participation in the August 30, 2018 conference call to discuss the interim results of the Pre-Design Investigation Work Plan (PDIWP) for the Lower Ley Creek Subsite. You provided follow-up comments in a letter to the Respondents dated September 7, 2018. This letter responds to your comments, and provides additional information related to forthcoming additional field investigations.

1. General Comment: All RI soil/sediment sample locations and results should be included on each of the figures.

Respondents: *The figures provided for the August conference call were not intended to be final. The RI soil/sediment samples and results are illustrated on each of the enclosed figures (Attachment 1).*

2. General Comment: Topographic elevations should be clearly noted on the maps.

Respondents: *The figures provided for the August conference call were not intended to be final. Nevertheless, the topographic elevations are clearly noted on the figures. The forthcoming comprehensive submittals will include a separate illustration of existing topographic and bathymetric contours to ease review.*

3. Figure 1b – Soil- L. During our call, you stated that you would confirm that the "proposed removal extent reduction area" (PRERA) overlaps the previously remediated Town of Salina landfill area. You also stated that you would confirm that the post-remedial samples show that the areas exceeding the remedial

criteria have been fully remediated. Approval of the Soil-L PRERA will not be granted until that is completed.

Respondents: *The Respondents noted on the call that there is no basis or supporting authority for extending the scope of the Lower Ley Creek Sub-Site work onto the Salina Landfill Sub-Site, but nevertheless, did agree to secure and provide the Agency with the information and detail requested by USEPA and/or NYSDEC.*

Accordingly, Figure 1b of Attachment 1 illustrates the boundaries of the Landfill Sub-Site south of Ley Creek in the vicinity of the Soil-L PRERA, and the spatial extent of excavation in the area of Parcel 6 provided by the Town of Salina's engineer, as well as associated post-landfill closure sampling data in the vicinity of the landfill boundaries. Note that this information was previously provided to EPA by the Town of Salina's engineer, and has been used by EPA in their post-closure reporting cited below.

*Also enclosed is EPA's First Five-Year Review Report, Onondaga Lake Superfund Site, Salina Landfill Subsite (May 2016) (Attachment 2). On pages 9 and 10 of the report, EPA states that "[*d]uring the RA, approximately 176,000 cubic yards of material was excavated from Parcel 6 [area south of Ley Creek]. Approximately 1,100 tons of PCB-contaminated material at levels greater than 50 mg/kg was disposed of at the Model City Landfill in Model City, New York. After consolidating the nonhazardous material on the northern landfill, the material was graded and the landfill was capped.*"*

*On Page 18 of the same document, EPA further assert that "*a fence controls access from the east, Ley Creek limits access from the south and highways on the north and wetlands to the west of the landfill make the Subsite difficult to access*", and that although PCBs in Parcel 6 were slightly above the commercial soil cleanup objectives in a few certain areas, the concentrations were acceptable with respect to the risk range for PCBs. Finally, EPA concluded that* "[t]hese areas are also protected by a grass and dirt cover, therefore, combined with the accessibility restrictions described previously, they are not considered to be of concern.*"*

In summary, EPA concluded in the Salina Landfill's First Five-Year Review Report that the completed remedial actions adequately addressed all exposure pathways that could result in unacceptable risks, the remedy is protective of human health and the environment, and there are no recommendations or follow-up actions stemming from the five-year review. In addition, there is no basis or supporting authority for extending the scope of the Lower Ley Creek Sub-Site work onto the Salina Landfill Sub-Site.

4. Figure 1b - All sediment areas outside of the creek should be shown on the soil excavation maps. It is not clear if the entire area where SS-21 and SB-07 are located will be excavated. If not, then additional samples should be taken to justify that decision.

Respondents: *Sediment and soil data outside of the creek is illustrated on the enclosed figures. For reference, both sample locations SS-21 and SB-07 are included in removal area SED-L.*

5. Figure 1c – Within the Soil-I PRERA, historic sediment samples (SW-3 and SW-4) indicate there is PCB contamination which exceeds the removal criteria. Additional soil/sediment samples should be taken within the PRERA to determine the extent of removal.

Respondents: *As illustrated on the revised figures, SW-3 and SW-4 are located within what appears to be a drainage way that drains an area to the south west of the Old Ley Creek channel and drains into the Old Ley Creek channel near its confluence with the Lower Ley Creek channel. Additional sample locations, illustrated on the enclosed figures, have been added within the PRERA to isolate the drainage way and characterize the associated immediately adjacent floodplain areas.*

6. Figure 1c- There should be another step-out sample beyond Soil-I-015-Step and Soil-I-006.

Respondents: *Noted, additional sample locations have been added as requested as illustrated on the enclosed figures.*

7. Figure 1d- There should be another couple of samples between LLCD33 and the creek (between Soil-E and Soil-H) as there are only limited data in this area. Also, Soil-F should not be based on just one sample result as additional samples will refine the excavation limits.

Respondents: *Noted, additional sample locations have been added between Soil-E and Soil-H as illustrated on the enclosed figures. As discussed in the December 2016 PDIWP, remediation in Soil-F is driven by metals exceedances only, will be addressed by removal of the entire area delineated by EPA in the RI/FS, and will not be subject to further delineation or post RA confirmation sampling.*

8. Figure 1e – Soil-D. There should be another sample and an archive sample beyond Soil-D-023-Step.

Respondents: *Noted, additional sample locations have been added as illustrated on the enclosed figures.*

9. Figure 1f – Soil-C. There should be another sample and an archive sample beyond Soil-C-027-Step.

Respondents: *Noted, additional sample locations have been added as illustrated on the enclosed figures.*

10. Figure 1g – The PRERA was originally identified as needing excavation since Sample LLCD13 exceeded the remedial criteria for other contaminants of concern (as per the ROD – Table 1). Please add additional soil samples within around that area. The PREVA is not accepted as drawn although it may be accepted once adjusted following additional sampling.

Respondents: *Noted, upon additional consideration it appears that LLCD14 also exceeded the remedial criteria for other contaminants of concern, and as a result will be remediated and the PRERA withdrawn. However, as discussed in the PDIWP, remediation in this area is driven by metals exceedances only, will be addressed by removal of the entire area delineated by EPA in the RI/FS, and will not be subject to further delineation or post RA confirmation sampling.*

11. Figure 1h - Soil-B Area: Additional soil samples should be taken upstream and downstream of this area to determine the extent of removals needed.

Respondents: *Noted, additional sample locations have been added as illustrated on the enclosed figures.*

12. In the Upper Ley Creek site, numerous exceedances for PCBs have been found within the flood plain in areas where dredged materials have not been spread. The same may be true for Lower Ley Creek. Therefore, please take some additional samples along the east side of the creek (between the railroad tracks and the creek bank) along the reach south of the Crouse-Hinds South Landfill to determine if any removals are warranted in this area.

Respondents: *The area identified in your comment is a very narrow, heavily wooded area rising from Ley Creek to the nearby railroad track and associated ballast. Simply stated, it is not easily accessed and there are open issues regarding the location of the railroad right-of-ways and the potential need to secure access from the railroad. As the Respondents are focused on completing the PDI this fall, these constraints alone may significantly delay the completion of the remainder of the PDI.*

Further, Respondents have not been provided with the cited Upper Ley Creek floodplain data and site maps. As a result, Respondents have not had an opportunity to assess whether topographic/flooding conditions and PCB levels found in Upper Ley Creek provide justification for expanding testing into the remote, downstream, non-floodplain location referenced in your comment that is miles from the General Motors source of PCBs.

We also note that: (1) the subject location was not identified for sampling as part of EPA's Remedial Investigation; and (2) immediately across Ley Creek and west/north of the area referenced by your comment, where there are generally flatter slopes and more typical floodplain terrain, only limited areas have been identified for soil excavation based on very slight exceedances of the 1ppm PCB surface soil criteria. This difference in slopes and floodplain conditions on the west and east side of the channel is illustrated on the enclosed cross-sections (Attachment 3). As can be seen, in the area in question, the east side of the channel is generally a steep bank from the channel bottom to the railroad ballast, with very little area where typical deposition might be anticipated as opposed to the west side of the channel where deposition would more normally be anticipated and only low PCB concentrations were detected.

For all the above reasons, Respondents propose to complete the remainder of the PDI consistent with their responses to Comments 1 to 11 above. If, upon consideration of Respondents' response to this Comment 12, EPA still believes there is a potential need to sample the referenced area, Respondents request that they be provided with all of the relevant and necessary data from the Upper Ley Creek site so that it can be reviewed and evaluated to determine if it supports reversing the initial EPA decision not to sample this location.

Please let me know if you have any questions.

Sincerely,

Arcadis of New York, Inc.

Todd Cridge

Principal

Copies:
Margo Ludmer, USEPA
Jacky Luo, NYSDEC
Donald Hesler, NYSDEC
Alma Lowry, Law Office of Joseph Heath

Attachment:
1 – Figures 1b through 1i
2 – First Five-Year Review Report, Onondaga Lake Superfund Site, Salina Landfill Subsite (May 2016)
3 – Select Lower Ley Creek Cross Sections